

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

SARAH MOLINA, et al.,)	
)	
Plaintiffs,)	
)	Case No.: 4:17-cv-2498 AGF
v.)	
)	
CITY OF ST. LOUIS, MISSOURI, et al.,)	
)	
Defendants.)	

DECLARATION OF ZACH CHASNOFF

I, Zach Chasnoff, declare as follows:

1. I am over the age of 18. I have personal knowledge of the facts set forth in this declaration and could and would testify competently to those facts if called as a witness.
2. On March 15, 2012, I protested near the Compton Hills Reservoir Park near the intersection of Grand Avenue and I-44 as part of the Occupy movement, which St. Louis Metropolitan Police Department officers had opposed and suppressed.
3. I did not commit, or see any other protestor commit, any act of violence or pose any threat to any person or property.
4. I saw St. Louis Metropolitan Police Department officers deploy tear gas against people they perceived to be expressing an anti-law enforcement view in order to retaliate against them for that perceived view and chill them from publicly expressing it, including myself.
5. I saw SLMPD officers deploy tear gas against people who were unarmed, non-threatening, nonviolent, and not engaged in any crime, as they were dispersing.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated this 13th day of August, 2020

By: /s/ Zach Chasnoff
Zach Chasnoff